

The Community Television Network is filing comments in support of CG Docket 05-231 by the Alliance for Community Media Petition for Waiver of Registration and Certification Requirement of Closed Captioning Rules.

The Community Television Network is a non-profit organization that operates two Public Access Television Stations in Portland Maine. Channel 2 serves Portland alone and Channel 5 is a regional channel serving Portland and 15 surrounding communities.

In the past year over 100 of our Access Producers produced 1,658 first run programs. CTN also produced over 27 hours of programming for our large number of non-profit members. Some of our producers provide programming on a regular basis. Others produce programs only occasionally, or even one-time only. In addition to programs produced here in Portland we also air programs produced elsewhere in the state of Maine, and from elsewhere in the United States.

We feel that requiring our local community PEG producers register with the FCC and certify that they are exempt from captioning requirements would be both cumbersome and an unreasonable burden on them. Our producers are not professionals but ordinary citizens who are taking advantage of the free speech opportunities that Public Access television provides to them. The FCC registration requirement may act as a deterrent for some producers who may feel that the requirement is an infringement of their rights.

The Community Television Network is a small, non-profit organization. We operate with one full-time and three part-time staff members. It would be an undue burden on our organization to have to track registration compliance not only of our local producers but of producers elsewhere in Maine and throughout the United States who air programs on our channels.

The registration requirement is unnecessary in our case since our yearly revenue falls well below the \$3 million per channel threshold. Our view is that as long as our two channels are exempt from the captioning requirements, and we file the required documentation, that any program producer who submits a program for air on our channels be covered under that exemption and not be required to register individually.

Although we recognize that the Producer registration requirement may provide some consumer feedback information we do believe that registering PEG Access Producers on exempt channels will actually help the consumers themselves.

Thank you for the opportunity to comment on this proceeding.

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